

5. On or about May 20, 2015, Mr. Riedl contacted me, a shareholder and credit-holder of RKO, to sell his controlling interest in RKO to me.

6. On May 30, 2015, I purchased Mr. Riedl's Series A Preferred Stock, acquiring voting control of RKO. On June 1, 2015, I was appointed to the Board of Directors and elected President and Secretary of the company to fill the void left by Mr. Riedl's resignation.

7. After reviewing RKO's books and records, I noticed that certain filings were not completed and on June 1, 2015, I caused RKO's corporate status to be reinstated into good standing with the State of Nevada.

8. Additionally, on June 2, 2015, I acquired the domain name www.rkoresources.com in order to better execute the new business plan for RKO's future goals.

9. Despite Neil Welch's statement to the contrary (*Welch Affidavit*, ¶ 10), in or about May 2015 I contacted Marlene Hutcheson, De Joya Griffith, of Hancock, Askew & Co., RKO's last public accounting firm and discussed the costs and timing of auditing RKO's financial statements in order to resolve the company's deficient filings under the Securities Exchange Act of 1934, as amended (the "Exchange Act"). Moreover, Mr. McCarthy's statement regarding his conversation with Welch is inadmissible hearsay which cannot be considered on a Motion for Summary Disposition.

10. The fact is that I spoke with Marlene Hutcheson at that time to evaluate the process, timing and cost for RKO to complete the past due audits, prior to a hearing date in this matter.

11. RKO is and always has been prepared to cure any deficiencies and make all requisite filings, past and present, so as to avoid having its registration permanently revoked. However, given the prospects of facing deregistration even if all deficient filings are made, I

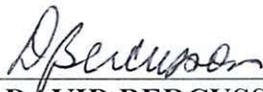
2/3 B - Commission
affirmative

have had to make the assessment that expending RKO's time and resources to be in a position to make all deficient filings, only to have its registration revoked, creating an obligation to file new, additional filings, including a registration statement, would not be an appropriate use of the Company's resources. However, if the Company's registration statement is ultimately not revoked, we are prepared to cure all deficient filing obligations.

12. Accordingly, RKO requests that the Motion for Summary Disposition be denied and that a hearing, be scheduled to address RKO's filings and the merits of the action to permanently revoke its registration revoked.

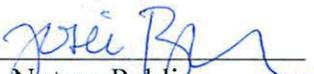
WHEREFORE, based on all of the foregoing reasons, RKO respectfully requests that the Petitioner's Motion for Summary Disposition be vacated and that a hearing be scheduled to address RKO's filings and the permanent revocation of its registration statement.

Dated: November 9, 2015



DAVID BERCUSSON

Sworn to before me on this
9th day of November, 2015



Notary Public



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3/3 B

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November 12, 2015

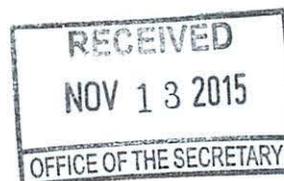
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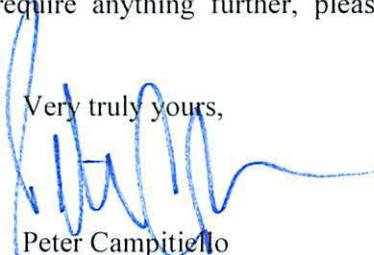
Re: RKO Resources, Inc.
Administrative Proceeding File No. 3-16525

To Whom It May Concern:

Please be advised that this firm is counsel to RKO Resources, Inc., the Respondent in the above-referenced matter ("RKO"). Enclosed are an original and three (3) copies of RKO's Affidavit in Opposition of Petitioner's Motion for Summary Disposition.

Should you have any questions or require anything further, please feel free to contact the undersigned.

Very truly yours,


Peter Campitiello

cc: Neil J. Welch, Esq. (*Via Overnight Delivery*)
U.S. Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549